

1 NOAH GRAFF, Assistant Chief Counsel, (SBN# 192795)
ngraft@scif.com
2 R. TIMOTHY O'CONNOR, Staff Counsel (SBN# 179631)
rtoconnor@scif.com
3 JOHN B. DE LEON, Staff Counsel, (SBN# 261381)
jdeleon2@scif.com
4 STATE COMPENSATION INSURANCE FUND
900 Corporate Center Drive, Suite 401
5 Monterey Park, California 91754
Telephone: (323) 526-2045
6 Facsimile: (323) 526-2012

7 Attorneys for Plaintiff
STATE COMPENSATION INSURANCE FUND,
8 A Public Enterprise Fund

9 MICHAEL J. STRUMWASSER (SBN 58413)
BRYCE A. GEE (SBN 222700)
10 JULIA MICHEL (SBN 331864)
STRUMWASSER & WOOCHELL LLP
11 10940 Wilshire Boulevard, Suite 2000
Los Angeles, California 90024
12 Telephone: (310) 576-1233
Facsimile: (310) 319-0156
13 mstrumwasser@strumwooch.com
bgee@strumwooch.com
14 jmichel@strumwooch.com

15 Attorneys for Defendants
RICARDO LARA and THE CALIFORNIA
16 DEPARTMENT OF INSURANCE

17 **UNITED STATES DISTRICT COURT**
18 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

19 STATE COMPENSATION INSURANCE
20 FUND, a Public Enterprise Fund,

21
22 Plaintiff,

23 vs.

24 RICARDO LARA in his capacity as
INSURANCE COMMISSIONER OF THE
25 STATE OF CALIFORNIA; and THE
CALIFORNIA DEPARTMENT OF
26 INSURANCE, an Agency of the State of
California,

27
28 Defendants.

CASE NO. 2:20-CV-01289-JAM-CKD

**STIPULATION AND ORDER TO
CONTINUE RULE 26(F)
CONFERENCE AND JOINT STATUS
REPORT DEADLINES**

1 Plaintiff STATE COMPENSATION INSURANCE FUND (“Plaintiff” or “State Fund”),
2 and Defendants RICARDO LARA in his capacity as INSURANCE COMMISSIONER OF THE
3 STATE OF CALIFORNIA, and THE CALIFORNIA DEPARTMENT OF INSURANCE, an
4 Agency of the State of California (“Defendants”)(collectively, the “Parties”), by and through their
5 respective counsel of record, hereby respectfully apply to this Court for an Order continuing the
6 date for the Parties to confer as required by Fed. R. Civ. P. 26(f) and to prepare and submit a joint
7 status report as set forth below.

8 WHEREAS, on June 26, 2020, State Fund filed a Complaint for Declaratory and Injunctive
9 Relief;

10 WHEREAS, service was effectuated on July 20, 2020;

11 WHEREAS, Defendants’ response to Complaint is currently due on October 6, 2020,
12 pursuant to Parties Stipulation filed on August 31, 2020;

13 WHEREAS, pursuant to the Order Requiring Service of Process and Joint Status Report,
14 provided by the Court upon filing of the complaint, the sixty (60) day deadline to confer, prepare,
15 and submit a Joint Status Report currently falls on September 18, 2020;

16 WHEREAS, the Parties have met and conferred on Plaintiff’s Complaint and Defendants’
17 intent to respond by way of a motion to dismiss Plaintiff’s Complaint, and the parties agreed that
18 postponing the Rule 26(f) conference and the Joint Status Report until after a ruling on Defendants’
19 motion and after the pleadings are set would permit a more meaningful Rule 26(f) conference and
20 a more complete Joint Status Report;

21 NOW, THEREFORE, IT IS HEREBY STIPULATED, between the Parties, subject to the
22 Court’s approval, that: the last date for the Parties to confer pursuant to Rule 26(f) and to submit a
23 Joint Status Report shall be continued until two weeks following the filing of Defendants’ Answer
24 to the Complaint or to any amended Complaint.

25 ///

26 ///

27 ///

28 ///

IT IS SO STIPULATED.

DATED: September 10, 2020

STRUMWASSER & WOOCHEER LLP

By: /s/Michael J. Strumwasser

Michael J. Strumwasser

Bryce Gee

Julia Michel

Attorneys for Defendants

RICARDO LARA in his capacity as INSURANCE

COMMISSIONER OF THE STATE OF

CALIFORNIA; and THE CALIFORNIA

DEPARTMENT OF INSURANCE, an Agency of
the State of California

DATED: September 10, 2020

NOAH GRAFF

Assistant Chief Counsel

By: /s/R. Timothy O'Connor

R. Timothy O'Connor

John B. de Leon

Attorneys for Plaintiff

STATE COMPENSATION INSURANCE FUND

ORDER

For good cause shown, the above Stipulation is adopted as follows:

The last date for the Parties to confer pursuant to Rule 26(f) and to submit a Joint Status Report shall be continued until two weeks following the filing of Defendants' Answer to the Complaint or to any amended Complaint.

IT IS SO ORDERED.

Dated: September 10, 2020

/s/ John A. Mendez

Hon. John A. Mendez, U.S. District Court Judge